IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Patent Application of

MENDIS et al   Atty. Ref.: 36-1999

Serial No. 10/589,613   TC/A.U.: 2175

Filed: August 16, 2006   Examiner: Nunez, Jordany

For: DATA HANDLING SYSTEM

* *

December 7, 2009

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Sir:

 Appellant hereby appeals to the Board of Patent Appeals and Interferences from

the last decision of the Examiner.

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(I)   REAL PARTY IN INTEREST

The real party in interest is British Telecommunications Public Limited Company,

a corporation of the country of England.

(II)   RELATED APPEALS AND INTERFERENCES

The appellant, the undersigned, and the assignee are not aware of any related appeals, interferences, or judicial proceedings (past or present), which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

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(III)   STATUS OF CLAIMS

Claims 1-28 are pending and have been rejected. The rejections of claims 1-28 are being appealed. No claims have been substantively allowed.

(IV)   STATUS OF AMENDMENTS

No amendments have been filed since the date of the Final Rejection.

(V)   SUMMARY OF CLAIMED SUBJECT MATTER

A listing of the representative independent claim and each dependent claim argued separately is provided below including exemplary, but not limiting, reference(s) to reference numerals, Figure(s) and page and line number(s) of the specification.

The invention of the claims relates to a data handling system (e.g., Fig. 1) which applies metadata tags 51, 52, 53 to media objects 101-107 displayed on a display 20 by selecting an individual media object (e.g., 107) and placing a representation of the selected media object (e.g., 107) in a region (e.g., 512) of the display 20 representing the designated tag (e.g., Figs. 1, 4-6, p. 7, lines 6-16, p. 8, lines 19-28, p. 8, line 32 to p. 9, line 10).

Independent Claim 1 relates to a data handling device (e.g., CPU 10, storage devices 12-15, Fig. 1, p. 6, lines 23-30) for organizing and storing media objects (e.g., 101-107, Figs. 4-6) for subsequent retrieval, the media objects having associated metadata tags (e.g., 41, 51-53, 61-63, Figs. 4-6, p. 9, lines 2-7, 11-18), comprising a display 20 for displaying representations of the media objects (e.g., 101-107), data storage means (e.g. 12) for allocating metadata tags to the media objects (e.g., p. 9, lines 11-18), an input device (e.g., 17, 18, p. 6, lines 31-33) comprising means to allow a representation of a selected media object (e.g., 101, 102, Fig. 4) to be selectively moved by a user into a region of the display (e.g., 401, Fig. 4) representing a selected set of metadata tags (e.g., "Advertising"), and user activated means (e.g., 17, 18) for causing the selected set of metadata tags (e.g., "Advertising") to be added to those allocated to the selected media object (e.g., 101, 102) in the data storage means (e.g., 12), Figs. 1, 4-6, p. 7, lines 6-16, p. 8, lines 19-28, p. 8, line 32 to p. 9, line 10.

Independent Claim 15 relates to a method of organizing and storing media

objects (e.g., 101-107, Figs. 4-6) for subsequent retrieval, the media objects being

represented in a display 20, wherein metadata tags (e.g., 41, 51-53, 61-63, Figs. 4-6, p. 9,

lines 2-7, 11-18) are applied to the media objects (e.g., 101-107, Figs. 4-6) by selecting

an individual media object (e.g., 101, 102, Fig. 4) from the display 20, and causing a set

of metadata tags (e.g., "Advertising") to be added to the selected media object (e.g., 101,

102, Fig. 4) by selectively placing a representation of the selected media object in a

region (e.g., 401, Fig. 4) of the display 20 selected to represent the set of metadata tags to

be added (e.g., Figs. 1, 4-6, p. 7, lines 6-16, p. 8, lines 19-28, p. 8, line 32 to p. 9, line 10).

Dependent Claim 8 relates to the data handling device (e.g., CPU 10, storage

devices 12-15, Fig. 1, p. 6, lines 23-30), wherein representations of the media objects

(e.g., 101-107) are capable of being moved between regions (e.g., 401-411, 511-532,

Figs. 4-5) of the display area 20 representing sets of metadata tags having pre-defined

values (e.g., "Advertising", "Affairs", "Documentary"), wherein the data handling device

further comprises

means (e.g., CPU 10, Fig. 1) for removing a representation of a selected media

object (e.g., 101) from one display area (e.g. 401) and adding it to a second area (e.g.,

409), thereby applying the metadata tag set (e.g., "Soap") associated with the second area

to the selected media object 101 in place of the set of metadata tags associated with the

first area (e.g., "Advertising") (e.g., Fig. 4, p. 9, lines 11-16), and

wherein a representation of a media object (e.g., 107) selected from a display area

(e.g., 512) associated with a first metadata tag set (e.g., "Fight") applied to the media

object may remain there whilst a copy of the selected media object (e.g., 107) is placed in

a second area of the display area (e.g., 532), thereby applying the metadata tag set associated with the second area (e.g., "Fast") to the media object in addition to the set associated with the first area (e.g., p. 9, lines 25-28).

Dependent Claim 13 relates to a providing means for making the size of the display area (e.g., 401, 405) allocated to each set of metadata tags proportional to the number of media objects (e.g., 101, 102, 105) portrayed therein (p. 3. lines 33-34; p. 4, lines 27-28; p. 8, lines 29-35).

Dependent Claim 21 relates to a method of organizing and storing media objects for subsequent retrieval, in which representations of the media objects (e.g., 101-107) are moved between regions of the display area (e.g., 401-411, 511-532, Figs. 4-5) representing sets of metadata tags having pre-defined values (e.g., "Advertising", "Affairs", "Documentary"), wherein

a representation of a media object (e.g., 107) is selected from a first display area (e.g., 512) associated with a first metadata tag set (e.g., "Fight"), and a copy of the selected representation (e.g., 107) is placed in a second area of the display area (e.g., 532) whilst the original representation remains in the first area (e.g., 512), thereby applying the metadata tag set associated with the second area (e.g., "Fast") to the media object 107, in addition to the set associated with the first area 512.

Dependent Claim 27 relates to the size of the display area (e.g., 401, 405) allocated to each set of metadata tags being proportional to the number of media objects (e.g., 101, 102, 105) portrayed therein (p. 3. lines 33-34; p. 4, lines 27-28; p. 8, lines 29-35).

(VI)   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

(i) Whether claims 1 and 15 are anticipated under 35 U.S.C. §102(b) by Madrane (US 6,573,907).

(ii) Whether claims 2-14, 16-21 and 23-28 are anticipated under 35 U.S.C. §102(b) by Madrane (US 6,573,907).

(iii) Whether claim 22 is unpatentable under U.S.C. §103(a) over Madrane (US 6,573,907).

(VII) <u>ARGUMENT</u>

It is axiomatic that in order for a reference to anticipate a claim, it must disclose, teach or suggest each and every feature recited in the claim. See, e.g., *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983), *Verdegaal Bro. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (MPEP § 2131). The USPTO has the burden in this respect.

Moreover, the USPTO has the burden under 35 U.S.C. Section 103 of establishing a prima facie case of obviousness. *In re Piasecki*, 745, F.2d 1468, 1471-72, 223 USPQ 785, 787-88 (Fed. Cir. 1984). It can satisfy this burden only by showing that some objective teaching in the prior art, or that knowledge generally available to one of ordinary skill in the art, would have led that individual to combine the relevant teachings of the references to arrive at the claimed invention. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). Before the USPTO may combine the disclosures of the references in order to establish a prima facie case of obviousness, there must be some suggestion or rationale for doing so. *In re Jones*, 958 F.2d 347 (Fed. Cir. 1992). Prior art references can be combined to render an invention obvious only if there is some apparent reason, either in the references themselves or in the knowledge generally available to one skilled in the art, to combine them. *KSR Int'l Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 82 USPQ2d 1385 (2007). Even assuming, *arguendo*, that a given combination of references is proper, the combination of references must in any event disclose the features of the claimed invention in order to render it obvious.

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(i) *Claims 1 and 15 are not anticipated by Madrane under 35 U.S.C. Section 102(b)*

Claims 1 and 15 stand rejected under Section 102(b) as being allegedly anticipated by Madrane (US 6,573,907). This Section 102(b) rejection should be reversed for at least the following reasons.

Claim 1 requires "means to allow a representation of a selected media object to be selectively moved by a user into a region of the display representing a selected set of metadata tags, and user activated means for causing the selected set of metadata tags to be added to those allocated to the selected media object in the data storage means". This limitation is not disclosed in Madrane.

Thus, for example, referring to Figs. 4-6 of the instant application, by having a user selectively place a representation of a media object in a particular region of a display, (e.g., by a "click and drag" operation) a metadata tag associated with that region is added to that object. For example, as can be seen in Fig. 4, media objects 101 and 102 are dragged to region 401, so that the metadata tag "Advertising" associated with region 401 is added to the media objects 101 and 102. Similarly, media objects 103 and 104 are dragged to region 409, so that the metadata tag "Soap", associated with the region 409, is added to the media objects 103 and 104. In fact, multiple copies of the representation of a media object may be used, each placed in a different region, so that several metadata tags can be added to the same object (see p. 9, lines 1-2 of the instant specification). As described in the present specification, this process is more intuitive for the user to get a much better idea of how much more "marking-up" he/she needs to do by identifying the boxes that contain the most objects and which ones have the least or even none, and

deciding which metadata values are most relevant to a database than applying a set of

"labels" to each media object - the user is sorting the objects into categories (bins) rather

than labeling them (see p. 11, lines 31-33 of the instant specification).

Madrane generally discloses an interactive interface with video information stored

in a computer, so that the displayed view of a particular video sequence changes in

accordance with a designated viewing position set by the user. In Madrane, various video

sequences 8 along with associated metadata files 10 are stored in a CD-ROM 7 (Fig. 2,

col. 11, lines 53-67). The interface data file 10 applicable to the video sequence 8

selected by the user is processed in order to cause an interactive video icon (see Figs. 4-5)

to be displayed on the display screen 3. The user can then manipulate the displayed icon,

by making use of the mouse or keyboard, in order to explore the selected video sequence

(col. 12, lines 2-11). An example of an interactive video icon is a "root image"

comprising a sequence of selected frames from a video sequence (see Fig. 4 showing a

sequence of basic frames BF_1-BF_6).

In one type of manipulation, the user designates a position on the screen as a

viewing position relative to the displayed image and the central processor portion 2 of the

computer calculates the image data required to generate the displayed image from the

root image definition contained in the respective metadata file 10, image data of the basic

frames, and the viewing position designated by the user, e.g., A, B or C in Fig. 4 (col. 12,

lines 31-65). When the user designates a viewing position close up to the interactive

video icon, the image information in the area of interest is enriched by including in the

displayed image, image data relating to additional video frames besides the basic video

frames (e.g., see Fig. 5B where additional frames AF_1 and AF_2 are shown in proximity to

basic video frames BF_5 and BF_6), col. 12, line 66 to col. 13, line 15.

In another type of manipulation, certain objects in a root image are designated by

the designer of the interface as being of interest for the end user. Accordingly, the

designer includes in the interface data file information designating these objects as

"extractable". If the user expresses an interest in one of these objects (for example, by

clicking on them), then the interface application program 11 controls the displayed image

such that extraneous portions of the displayed frames disappear from the display, leaving

only a representation of the designated objects and their motion (see, for example, Figs.

7A and 7B, where the two people approaching each other are the designated objects, and

following the designation by the user, the objects of interest are extracted from their

surroundings and only a representation of the two people and their motion is displayed,

see Fig. 7B), col. 13, line 61 to col. 14, line 15.

The Examiner has identified the root images of Madrane as the claimed media

objects, and the information designating some objects in the displayed frames of a root

image as the claimed metadata tags. Moreover, the Examiner has identified as the

claimed representation of a selected media object to be selectively moved into a region of

the display, an area of interest (presumably in the root image) that is moved until it takes

up the whole display when moving up close by the user is performed. According to the

Examiner, "when moving up close, the display represents the area of interest, which

includes metadata tags". Finally, according to the Examiner, Madrane teaches the

claimed selected set of metadata tags to be added to those already allocated to the

selected media object, since "a designer may designate an area of interest of an image to

be extractable, and to be bounded and associated with an URL", see paragraph bridging pp. 2-3 in the final Office Action of September 4, 2009.

First, <u>Madrane does not teach displaying on the display various regions representing various values of the metadata tags</u>. Instead, in Madrane, the metadata tags are located in the various interface data files FDI_i 10, associated with respective video sequences, which can be "root images", i.e., a collection of selective video frames from the entire video sequence. Fig. 2 in Madrane shows that the video sequences 8, the respective metadata files 10, and the video interface application program 11, are recorded on the CD-ROM (col. 11, lines 62-67). <u>None of the frames of the various root images shown in Figs. 4 and 17-18 shows regions representing selected sets of metadata tags</u>. Instead, what is displayed in the various frames is merely scenes of the video sequence, without any information related to metadata values, <u>let alone metadata values selected by the user</u>. In Madrane, the metadata information is stored in conventional data file format, including a header and the information related to the respective video sequences, i.e., identification of the associated video sequence, identification of basic frames, identities and location of extractable objects, etc.

The Examiner alleged (see p. 11 of the final Office Action of September 4, 2009) that "a user indeed tags objects according to where the user places them *in the display itself, for example, in a screen of a zoomed in image, the object of interest would be at the center of the screen, where the designer place[s] it*, while other distant objects may be omitted (emphasis added)". Appellant disagrees with this allegation. However, even assuming *arguendo* that it were accepted, the center of the screen (to which the object of the interest may be placed by the designer as alleged by the Examiner) does not represent

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a selected set of metadata tags. Madrane therefore fails to disclose a region of the display representing a selected set of metadata tags as claimed.

Moreover, unlike the Examiner's assertion, <u>Madrane does not disclose selectively moving a representation of a selected media object to a region of the display</u>. Instead, in Madrane, the user designates a position on the screen as a viewing position relative to the displayed image (by clicking with the computer mouse). This causes a different sequence of video frames to be displayed (depending on the point of view chosen by the user), see, for example, Figs. 5A-5C. However, this is not the same as moving the media object (which is the root image) around on the display, as required by claims 1 and 15. The root image, i.e., the cuboid comprising the various frames, remains in the same location, with only the flow of the constituent frames changing.

Even if one considers one or more of the objects appearing in the various video frames as the claimed media objects (for example, the two people in Figs. 7A, 7B), <u>the user cannot selectively move those objects, instead, the user can only watch the flow of the sequence of the video frames that include those objects</u>. The language of claim 1 specifically recites "allow a representation of a selected media object to be <u>selectively moved by a user</u>".

The Examiner referred to the "zooming" of the root image (by selecting a designation point close to the root image displayed on the screen) as reading on the claimed moving of the selected media object. However, as mentioned above, <u>the root image does not move</u>. What happens with the "zooming" is that <u>additional frames</u> are displayed, so that a more detailed version of the video sequence is shown, "when the user designates a viewing position close up to the interactive video icon, the image

information in the area of interest should be enriched. This is achieved by including, in the displayed image, image data relating to additional video frames besides the basic video frames", see col. 12, line 67 to col. 13, line 4 in Madrane. In other words, a selected portion of the video icon is not moved, instead additional frames in proximity to the selected portion of the video icon are displayed.

In addition, <u>Madrane does not disclose the claimed addition of selected metadata tags to the selected media object, when the selected media object has been moved by the user to the region of the display representing the selected metadata tags.</u>

In the Response to Arguments section of the final Office Action of September 4, 2009, the Examiner stated "Thus, clearly, a designer designating the person walking as interesting causes metadata tags to be added to a media object based on where the object is placed in the display", see bottom of p. 10 of the Office Action. First, in Madrane, it is <u>the designer</u> that sets values for the metadata tags, <u>not the user</u> ("The designer of the interface has decided that the two people are objects that may be of interest to the end user. Accordingly, he has included, in the interface data file, information designating these objects as "extractable", see col. 13, line 64 to col. 14, line 1). Second, no metadata tags are <u>added</u> to the object, i.e., the two people walking toward each other, instead, the various video frames in the sequence of frames are altered so that only the two objects are displayed. However, this action is caused <u>because</u> of the metadata tags associated with those objects <u>previously</u>. As the two people are shown in the various video frames (see Fig. 7B), they do not carry with them added metadata tags. <u>The tags stay in the interface data file, set there by the designer not the user.</u>

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As noted above, the Examiner also stated (see p. 11 of the final Office Action of September 4, 2009) that "a user indeed tags objects according to where the user places them in the display itself, for example, in a screen of a zoomed in image, the object of interest would be at the center of the screen, where the designer place[s] it, while other distant objects may be omitted". As alluded to above, moving or placing the user designated item (the person walking) to the center of the screen does not result in <u>selected metadata tags being added to the user designated item (the person walking). Madrane's center of the screen does not represent any metadata tags, and thus moving or placing the walking person or any other item designated in Madrane's center of the screen would not result in the addition of metadata tags to that item.</u>

Moreover, even though an object displayed on a frame may have a metadata tag associated with it (for example, designating it as being of interest for the user, which designation is done by the designer not the user), this does not mean that when this object moves around in subsequent frames, additional metadata tags are <u>added</u> to the object depending on where the object is. <u>In Madrane, a user cannot tag objects in a video frame, or tag selective video frames or tag a "root image".</u> The only tagging disclosed in Madrane is done by the designer prior to the release of the video data to the user, and this tagging has nothing to do with the user moving various video objects around on the display.

The tags applied to an individual object in Madrane represent the location of that object in the virtual three-dimensional world represented in the display, which may in turn affect how that object is displayed if the view of the display is changed (e.g., objects tagged as distant may be omitted from a zoomed-in image, as they would be off-screen).

However, this is not what is claimed. Applicants' invention of claims 1 and 15 requires the objects to be tagged according to where the user places them in the display itself.

The invention of claims 1 and 15 utilizes the user-controlled positioning of objects (icons) in the display area to cause tags to be applied to the objects; in contrast, Madrane utilizes tags for a number of purposes, one of which is to control the movement of objects in the display area.

For at least the above reasons, the anticipation rejection of claims 1 and 15 should be reversed.

(ii) *Claims 2-14, 16-21 and 23-28 are not anticipated under 35 U.S.C. §102(b) by Madrane (US 6,573,907).*

Claims 2-14, 16-21 and 23-28 stand rejected under Section 102(b), as being allegedly anticipated by Madrane. This Section 102(b) rejection should be reversed for at least the following reasons.

Claims 2-14, 16-21 and 23-28 are dependent on claim 1 or 15, and are in condition for allowance at least because the claim from which they depend (claim 1 or 15) is in condition for allowance.

Dependent claims 8 and 21

Regarding claim 8 (similarly for claim 21), said claim requires "a representation of a media object selected from a display area associated with a first metadata tag set applied to the media object may remain there whilst a copy of the selected media object is placed in a second area of the display area, thereby applying the metadata tag set

associated with the second area to the media object in addition to the set associated with the first area".

Thus, for example, a copy of a representation of a media object 107 which is in metadata tag region 512 may be created, and the copy may be placed in region 532. In this way, media object 107 acquires the metadata value "Fast" associated with region 532, in addition to the metadata value "Fight" that media object already had by being located in the region 512.

The portion of Madrane cited by the Examiner as teaching this further limitation merely discloses storage of data in a local memory unit and has nothing to do with adding metadata tags based on the user moving the media object from a first location of the display to a second location in the display. See final Office Action at pages 4 and 6; and Madrane at column 20, lines 45-50. Indeed, the cited portion of Madrane does not even mention a display. As discussed above, Madrane does not teach moving a media object from a first region of the display to a second region of the display, while adding metadata tags to the object depending on the region the media object is. At most, Madrane teaches controlling the display of a sequence of video frames depending on a designation by the user.

Dependent claims 13 and 27

Dependent claim 13 requires "making the size of the display area allocated to each set of metadata tags proportional to the number of media objects portrayed therein". Similarly, dependent claim 27 requires "wherein the size of the display area allocated to each set of metadata tags is proportional to the number of media objects portrayed therein."

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Madrane fails to disclose the above-noted limitations of claims 13 and 27. The first paragraphs of pages 5 and 7 of the Final Rejection allege that col. 5, lines 34-40 of Mardrane discloses the above-noted claim limitations. Appellant disagrees with this allegation. Col. 5, lines 34-40 of Madrane discloses the following:

> As he designates different viewing angles, the displayed image represents the root image seen from different perspectives. **When the user designates viewing positions at greater or lesser distances from the root image, the displayed image increases or reduces the size** and, preferably, resolution of the displayed information, accessing image data from additional video frames, if need be (emphasis added).

The above passage of Madrane merely discloses changing the size of the display image based on a user-designated viewing position (see, in particular, the bold faced portion of the above passage). There is absolutely no disclosure of the size of the display area **_allocated to each set of metadata tags proportional to the number of media objects portrayed therein_**.

(iii) _Claim 22 is patentable under 35 U.S.C. §103(a) over Madrane (US 6,573,907)._

Claim 22 stands rejected under Section 103(a), as being allegedly unpatentable over Madrane. This Section 103(a) rejection should be reversed for at least the following reasons.

Claim 22 is dependent on claim 15, and is in condition for allowance at least because the claim from which it depends (claim 15) is in condition for allowance.

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CONCLUSION

In conclusion it is believed that the application is in clear condition for allowance;

therefore, early reversal of the Final Rejection and passage of the subject application to

issue are earnestly solicited.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____ /Leonidas Boutsikaris/ _____

Leonidas Boutsikaris
Reg. No. 61,377

LB:tlm
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100

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(VIII)   <u>CLAIMS APPENDIX</u>

1.   A data handling device for organising and storing media objects for subsequent retrieval, the media objects having associated metadata tags, comprising a display for displaying representations of the media objects, data storage means for allocating metadata tags to the media objects, an input device comprising means to allow a representation of a selected media object to be selectively moved by a user into a region of the display representing a selected set of metadata tags, and user activated means for causing the selected set of metadata tags to be added to those allocated to the selected media object in the data storage means.

2.   A device according to claim 1, configured to allow a user to generate additional metadata tags having new values, such that the media objects may be further categorised.

3.   A device according to claim 1, configured to allow a user to obtain a view of media objects to which one or more of a predetermined plurality of metadata tags have been added.

4.   A device according to claim 1, configured to allow a user to obtain a view of media objects to which each of a predetermined plurality of metadata tags have been added.

5.   A device according to claim 4, wherein means are provided to provide user control of the maximum number of metadata tag sets to be displayed.

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6.   A device according to claim 1, in which representations of the media objects are capable of being moved between regions of the display area representing sets of metadata tags having pre-defined values.

7.   A device according to claim 6, comprising means for removing a representation of a selected media object from one display area and adding it to a second area, thereby applying the metadata tag set associated with the second area to the selected media object in place of the set of metadata tags associated with the first area.

8.   A device according to claim 6 wherein a representation of a media object selected from a display area associated with a first metadata tag set applied to the media object may remain there whilst a copy of the selected media object is placed in a second area of the display area, thereby applying the metadata tag set associated with the second area to the media object in addition to the set associated with the first area.

9.   A device according to claim 1, providing means for indicating the number of media objects associated with a given set of metadata tags.

10.   A device according to claim 1, providing means for indicating the number of metadata tags associated with one or more media objects.

11.   A device according to claim 10, providing means for identifying media objects to which no metadata tags have been applied by providing a display area representing an empty set.

12.   A device according to claim 1, providing means for selecting a subset of the media objects for allocating a given set of metadata tags.

13.   A device according to claim 1, providing means for making the size of the display area allocated to each set of metadata tags proportional to the number of media objects portrayed therein.

14.   A computer program or suite of computer programs for use with one or more computers to provide any of the apparatus as set out in claim 1.

15.   A method of organising and storing media objects for subsequent retrieval, the media objects being represented in a display, wherein metadata tags are applied to the media objects by selecting an individual media object from the display, and causing a set of metadata tags to be added to the selected media object by selectively placing a representation of the selected media object in a region of the display selected to represent the set of metadata tags to be added.

16.   A method according to claim 15, in which a user may generate additional metadata tags having new values, such that the media objects may be further categorised.

17.   A method according to claim 15, wherein a view is provided of media objects to which one or more of a predetermined plurality of metadata tags have been added.

18.   A method according to claim 15, wherein a view is provided of media objects to which each of a predetermined plurality of metadata tags have been added.

19.   A method according to claim 15, wherein provision is made to control the maximum number of categories to be displayed.

20.   A method according to claim 15, in which representations of the media objects are moved between regions of the display area representing sets of metadata tags having pre-defined values.

21.   A method according to claim 20, wherein a representation of a media object is selected from a first display area associated with a first metadata tag set, and a copy of the selected representation is placed in a second area of the display area whilst the original representation remains in the first area, thereby applying the metadata tag set associated with the second area to the media object, in addition to the set associated with the first area.

22.   A method according to claim 20 wherein a representation of a selected media object may be removed from a first display area associated with one metadata tag set when added to a second display area, thereby applying the set of metadata tags associated with the second display area to the selected media item in place of the set of metadata tags associated with the firs display area.

23.   A method according to claim 15, wherein the number of media objects associated with a given set of metadata tags is indicated.

24.   A method according to claim 15, wherein the number of metadata tags associated with one or more media objects is indicated.

25.   A method according to claim 24, wherein media objects to which no metadata tags have been applied are identified by providing a display area representing an empty set.

26.   A method according to claim 15, wherein a subset of the media objects may be selected for allocation of a given set of metadata tags.

27.   A method according to claim 15, wherein the size of the display area allocated to each set of metadata tags is proportional to the number of media objects portrayed therein.

28.   A computer program or suite of computer programs for use with one or more computers to provide the method of claim 15.

(IX) EVIDENCE APPENDIX

None.

(X)   <u>RELATED PROCEEDINGS APPENDIX</u>

None.